

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Consumer Financial Protection Bureau,

Plaintiff,

v.

Navient Corporation, *et al.*,

Defendants.

Case No. 3:17-CV-00101-RDM  
(Hon. Robert D. Mariani)

**DECLARATION OF NICHOLAS JABBOUR  
PURSUANT TO 28 U.S.C. § 1746**

I, Nicholas Jabbour, hereby declare and state as follows:

1. My name is Nicholas Jabbour. I am an attorney in the Office of Enforcement of the Consumer Financial Protection Bureau (“Bureau”). I have served in this position since June 2015. I am submitting this declaration in connection with the motion for summary judgment filed by the Bureau, in order to authenticate the exhibits to the Bureau’s statement of undisputed material facts filed in connection with that motion.

2. Exhibits 1-31 are true and correct copies of portions of transcripts from investigational hearings conducted in the pre-litigation investigation relating to this matter, or from depositions that were conducted during discovery in this matter.

3. Exhibits 32-35, 38, 42-55, 140, 165-166, 224-225, 252, 269-271, and

286 are true and correct copies of the webpages listed on the table of contents for the exhibits, all of which were captured using the software program Snagit.

4. Exhibits 36 and 167 are true and correct copies of court filings downloaded from the federal court ECF system.

5. Exhibits 37, 57-99, 101, 113-139, 141-142, 144-148, 150-164, 169-223, 226-251, 254-268, 274-276, 278-285, and 287 are true and correct copies, or portions thereof, of documents produced by Defendants.

6. Exhibits 39-41 and 272-273 are true and correct copies of documents available for download at the following website:

<https://navient.com/about/investors/stockholderinfo/annualreports/default.aspx>

7. Exhibits 56 and 149 are true and correct copies of documents obtained from a third party named the i3 Group.

8. Exhibit 100 is a true and correct copy of a declaration obtained from a third party named Lynn Sabulski.

9. Exhibit 102 is a true and correct copy of excerpts of a document from the U.S. Department of Education.

10. Exhibits 103-107 are true and correct copies of press releases obtained from Sallie Mae's website on April 22, 2019.

11. Exhibit 108 is a true and correct copy of a Navient press release available at the following website: <https://news.navient.com/news-releases/news->

release-details/new-data-shows-navient-continues-prevent-more-student-loan

12. Exhibit 109 is a true and correct copy of a Navient press release available at the following website: <https://news.navient.com/news-releases/news-release-details/navient-helps-improve-nations-student-loan-cohort-default-rate>

13. Exhibit 110 is a true and correct copy of a Navient press release available at the following website: <https://news.navient.com/news-releases/news-release-details/navient-ceo-statement-shareholder-meeting>

14. Exhibit 111 is a true and correct copy of a Navient press release available at the following website: <https://news.navient.com/news-releases/news-release-details/navient-statement-positive-trends-national-student-loan-cohort>

15. Exhibit 112 is a true and correct copy of a Navient press release available at the following website: <https://news.navient.com/news-releases/news-release-details/navient-ceo-shares-student-loan-borrower-stories-advocates>

16. Exhibit 143 is a true and correct copy of an email chain between the Bureau and Defendants.

17. Exhibit 168 is a true and correct copy of a complaint filed by a consumer with the Bureau.

18. Exhibit 253 is a true and correct copy of a document issued by the issued by the U.S. Department of Education available at the following website: <https://ifap.ed.gov/sites/default/files/attachments/>

eannouncements/GATotalPermDisablilityDischargeAssignPackProcedures.pdf

19. Exhibit 277 is a true and correct copy of excerpts of a Navient document available at the following website:

<https://ecfsapi.fcc.gov/file/60002098245.pdf>

20. Exhibit 288 is a true and correct copy of a declaration obtained from Ebony Johnson, a Bureau employee.

21. Exhibit 289 is a true and correct copy of a declaration obtained from Christopher Albanese, a Bureau employee.

22. All documents produced in native format (including spreadsheets and audio files) are true and correct copies of documents produced by Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed May 19, 2020.

/s/ Nicholas Jabbour

Nicholas Jabbour